

DECLARATION OF RECORDS CUSTODIAN OF
ARISTOTLE INTERNATIONAL, INC.

I, J. Blair Richardson Jr., pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of eighteen, am of sound mind, am capable of making this Declaration, and have personal knowledge of the matters stated herein.

2. I am an employee of, and custodian of records for, Aristotle International, Inc. ("Aristotle"). In that role, I am involved in the creation and retention of business records on behalf of Aristotle.

3. Attached hereto are fifteen (15) pages from the records of Aristotle responsive to the subpoena issued to Aristotle by Plaintiff in *Voter Reference Foundation, LLC, v. Raúl Torrez, et al.*, Case No. 1:22-cv-00222-JB-KK in the United States District Court for the District of New Mexico.

4. The attached records include:

a. **Attachment 1:** Aristotle's Data Services Marketing Brochure advertising Aristotle's data related services to actual and potential customers.

b. **Attachment 2:** Aristotle's Test VoterListsOnline.com Sales Order and Agreement used for Aristotle customers wishing to purchase access to New Mexico voter data

c. **Attachment 3:** Reproduction of VoterListsOnline.com Homepage, as produced and maintained by Aristotle, as of March 3, 2023. Accessible at: https://voterlistsonline.com/version2/site/page.asp?page_id=home.

d. **Attachment 4:** Reproduction of "What is Political Data" Blog Post, as produced and maintained by Aristotle, as of March 3, 2023. Accessible at: <https://www.aristotle.com/blog/2022/04/what-is-political-data/>.

EXHIBIT

P32

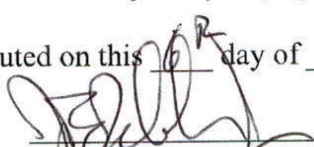
exhibitsticker.com

5. These fifteen (15) pages of records, and/or the website documented in these records, are kept and produced by Aristotle in the regular course of business, and it was in the regular course of business of Aristotle for an employee or representative of Aristotle with knowledge of the act, event, or condition recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time of the act, event, or condition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of March, 2023.

By:

 (signature)

J. Blair Richardson, Jr. (printed name)

Associate General Counsel (title/role)

On behalf of Aristotle International, Inc.

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